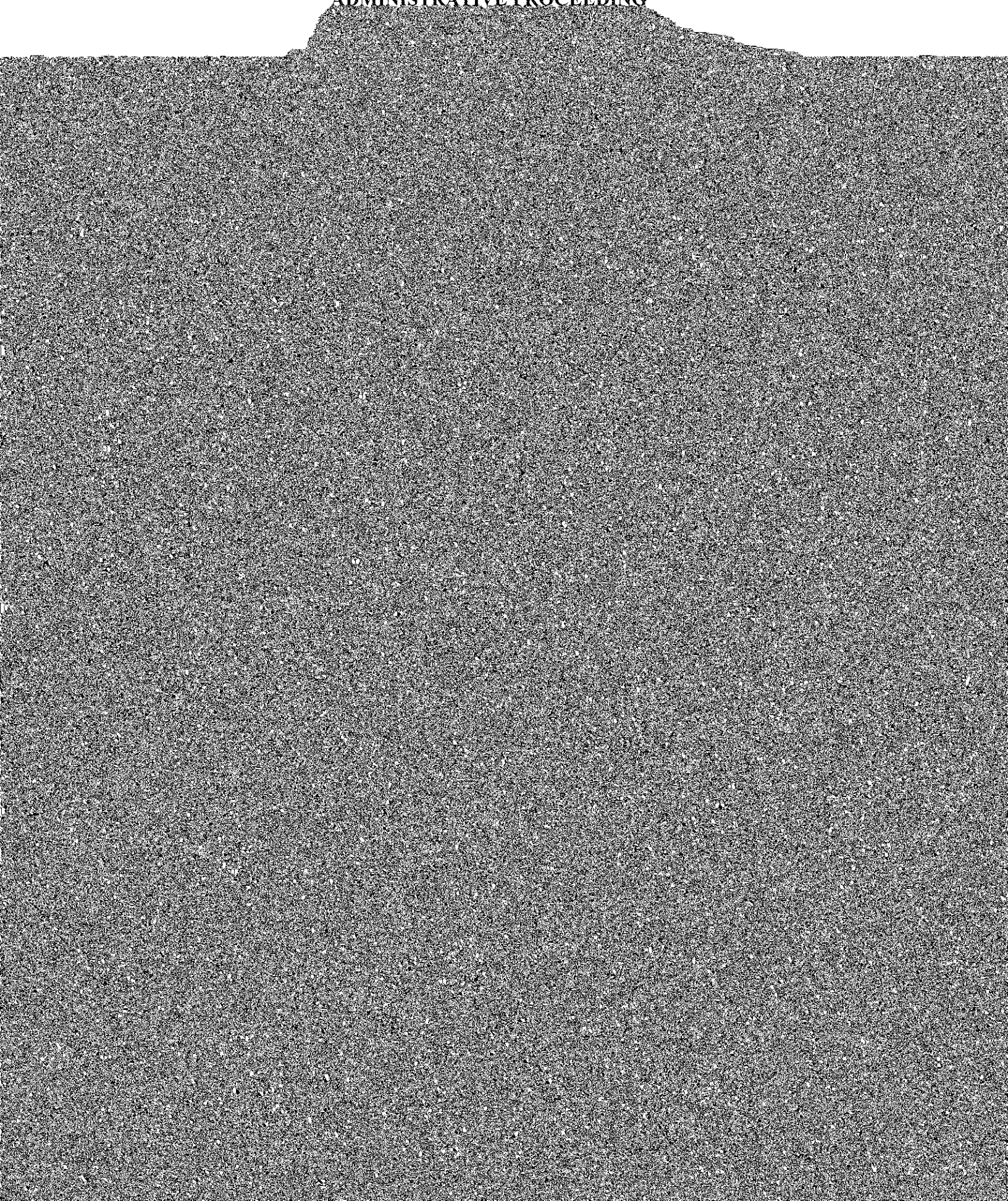


ADMINISTRATIVE PROCEEDING



11. Respondents engaged the Promoter to offer the Shares to the attendees at her Seminars and compensated her with either an offer of the Shares at a significantly discounted price or through the purchase of in excess of one hundred thousand dollars (\$100,000) worth of books, CDs, and other materials authored by the Promoter, or both.

c. Omitting to disclose the significant contingent liability faced by Respondent

shall result in this Order, including the stated civil penalty and any assessed costs, becoming final as to that Respondent by operation of law.

CONTINUING TO ENGAGE IN ACTS DETAILED BY THIS ORDER AND/OR SIMILAR

